

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

PATRICIA DODD

*Plaintiff,*

v.

ROBERT GLASER, IN HIS OFFICIAL  
CAPACITY; CESAR MALDONADO, IN  
HIS OFFICIAL CAPACITY, AND  
HOUSTON COMMUNITY COLLEGE  
*Defendants.*

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CIVIL ACTION NO. 4:21-cv-02216

JURY DEMANDED

**PLAINTIFF'S INITIAL RULE 26(a)(1) DISCLOSURES**

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Plaintiff Patricia Dodd  
("Plaintiff") provide the following initial disclosures:

Respectfully submitted,

**THE HALL LAW GROUP, PLLC**

/s/ Benjamin L. Hall, III

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State Bar No. 08743745

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**JIMMY ARDOIN & ASSOCIATES,  
PLLC**

**James Ardoin**

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**ATTORNEYS FOR PLAINTIFFS**

**CERTIFICATE OF SERVICE**

The undersigned certifies that all counsel of record were served with Plaintiffs' Initial Rule 26(a)(1) Disclosures on July 16, 2021.

/s/ Benjamin L. Hall, III

**Benjamin L. Hall, III**

**PRELIMINARY STATEMENT**

Plaintiffs incorporate by reference the following into all prior and subsequent disclosures, if any, they have or will provide in this action.

Plaintiffs' disclosures are made subject to and without waiving Plaintiff's right to protect any and all communications protected under the attorney-client privilege and attorney work-product doctrine.

**INITIAL DISCLOSURE**

- (i) The name and, if known, the address and telephone number of each individual likely to have the discoverable information – along with the subjects of that information – that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

Each of the following persons is believed to have information and knowledge relevant to either the claims, defenses, and/or damages involved in this litigation:

**1. Plaintiff: Patricia Dodd**

**Attorneys for Plaintiff:**

**Benjamin L. Hall, III  
William Van Fleet  
THE HALL LAW FIRM  
530 Lovett Blvd.  
Houston, Texas 77006  
(713) 942-9600**

**George Hittner  
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(713) 505-1003**

**Jimmy Ardoin  
Jimmy Ardoin & Associates, PLLC  
4900 Fournace Place, Suite 550  
Houston, Texas 77401  
(713) 574-8900**

**2. Defendants:**

**Robert Glaser  
Houston Community College  
Cesar Maldonado**

**Attorneys for Defendants:**

**Paul Lamp  
Melissa Goins  
Karczewski Bradshaw Spalding  
3700 Buffalo Speedway, Suite 560  
Houston, Texas 77098  
713-993-7075**

**3.**

**Janet May  
Shirriaya Walker  
Thomas Anderson  
Rogelio Anasagasti  
E. Ashley Smith  
Izzy Anderson  
Paul Lamp  
Melissa Goins  
Melissa Gonzalez  
Renee Mack  
David Cross  
Greg Cunningham  
Alan Ainsworth  
Kurt Ewen  
Norma Perez  
Fheryl Prestage  
Rodney Nathan  
Charles Smith  
Madeline Burillo-Hopkins  
Ana Belasquez  
Brandy Griffin  
James Bailey  
John Dziedic  
John Boxie  
William Carter  
Donny Leveston  
Aaron Henry  
Fredrick Portis**

**Amy Tan  
Marlene London  
Melissa Miller Waters  
Kristi Powers  
Officers of the HCC Police Department**

*HCC Employees/Attorneys/Vendor (former and present) who participated in, fostered, and/or implemented the complained of conduct alleged in this suit or are believed to have knowledge and/or information relating to same.*

- 4. John P. Hansen  
Adriana Tamez  
Eva L. Loreda  
Reagan Flowers  
Monica Flores Richart  
Rhonda Skillern-Jones  
Cynthia Lenton-Gary  
Pretta VanDible Stallworth  
Carroll Robinson  
Dave Wilson  
Chris Oliver**

**C/O HCC  
3100 Main Street  
Houston TX 77002  
(713) 718-2000**

*These individuals are former or present members of the HCC Board of Trustees and are believed to have knowledge of the Defendants' practices and actions alleged in this case, including but not limited to their de facto ratification and approval of the conduct complained about in this case.*

- 5. Wayne Dolcefino  
Dolcefino Consulting  
3701 Kirby Dr Ste 560  
Houston, TX 77098  
(713) 360-6911**

*Investigative journalist who is believed to have documents relating to some of the claims asserted in this case.*

- 6. Brittany Britto  
Houston Chronicle  
801 Texas St Ste 100  
Houston, TX 77002**

**(713) 220-7171**

*Higher Education reporter for the Houston Chronicle who is believed to possess information regarding the defendants' conduct complained about in this case.*

7. **U.S. Equal Employment Opportunity Commission  
Mickey Leland Building  
1919 Smith St.  
Houston, TX 77002  
(713) 651-4900**

*Governmental agency that received Plaintiff's sexual harassment, retaliation and ADA charge of discrimination, and supplement to same.*

8. **Dr. Richard Chen  
Baylor Scott & White Dallas Diagnostic Association Plano  
4716 Alliance Blvd. Pav II  
Plano, TX 75093  
(469) 800-6000**

*Physician familiar with Dr. Dodd's medical history and PTSD.*

9. **Officers, Administrators, and Members of Harris County Sheriff's Office  
1200 Baker St.  
Houston, TX 77002  
(713) 221-6000**

*These individuals are believed to have information relating to the sexual actions of Chancellor Cesar Maldonado with a subordinate female at HCC.*

10. **Kathryn Griffin Grinan  
2513 N. MacGregor Way  
Houston, Texas 77004  
(832) 273-6273**

*Ms. Griffin-Grinan is a rape victim and rape victim counselor She is consistently hired as an expert by law enforcement and governmental agencies to help recovering sexual assault survivors. She is also familiar with the status of the criminal allegations against Dr. Dodd and the rehabilitation efforts of Plaintiff relating to the trauma alleged in this case.*

11. **Sheriff Ed Gonzalez  
Harris County Sheriff's Office  
1200 Baker St.  
Houston, TX 77002  
(713) 221-6000**

*This individual is believed to have information relating to the relationship between Chancellor Cesar Maldonado and his female subordinate at HCC.*

12. **Officers, Administrators, and Members of Houston Police Department**  
**61 Riesner St.**  
**Houston, TX 77002**  
**(713) 247-4400**

*These individuals are believed to have information relating to the relationship between Chancellor Cesar Maldonado and his female subordinate(s).*

13. **Benjamin L. Hall, III**  
**State Bar No. 0874374**  
**Federal Bar No. 8787**  
**William Van Fleet**  
**STATE BAR NO. 20494750**  
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**JIMMY@JIMMYARDOINLAW.COM**  
**4900 Fournace Place, Suite 550**  
**Houston, Texas 77401**  
**(713) 574-8900**

*The above Plaintiff's counsel are familiar with and will provide testimony regarding the necessary and associated fees and costs to prosecute this litigation.*



**Plaintiffs will supplement this disclosure as warranted.**

- (ii) A copy – or a description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

**Plaintiff cross identifies all documents listed in Defendants' Initial Disclosure and any subsequent supplemental disclosures, if any. Such cross adoption does not, however, constitute Plaintiff's consent or agreement to the admissibility or relevance of any such documents and Plaintiff expressly reserves the right to object to the use or admission of any such documents or testimony of any such witness in this case.**

**In addition to exhibits accompanying Plaintiff's Original Petition filed in this matter, Plaintiff counsel have more responsive documents in their possession. Plaintiff's counsel is presently having those records imaged and will produce same once that imaging has been completed.**

- (iii) A computation of each category of damages by the disclosing party – who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary materials, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extend of injuries suffered.

**Response: The named plaintiff believes her compensatory and punitive damages, fees and costs will exceed \$10,000,000.**

- (iv) For the inspection and copying as under Rule 34, any insurance agreement under which insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

**Response: None**